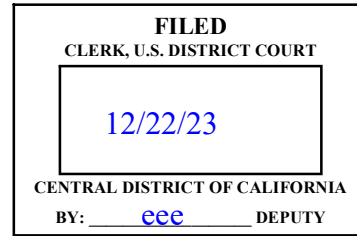


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Fax: NA
In Pro Per



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TAYLOR THOMSON

Plaintiff

v.

PERSISTENCE TECHNOLOGIES (BVI) PTE LTD.,
TUSHAR AGGARWAL, and ASHLEY RICHARDSON

Defendant(s).

CASE NUMBER:

2:23-cv-04669-MEMF-MAR

ANSWER TO COMPLAINT

PRELIMINARY STATEMENT

The plaintiff, Taylor Thomson, has been one of my closest friends for over a decade. During this time Taylor has asked me to do many things to help her, all of which were unpaid. Most recently she asked me to help her with the purchase of a number of alt coins with extremely low market caps on the advice of various physics. At the time she repeatedly expressed her wish for these purchases to remain unknown to her family and family office due to her past history of reckless investments.

I have never worked for Persistence nor do I have any alignment with them other than the transactions that took place on the plaintiffs behalf. I am facing extreme economic hardship due to health issues as well as a negative impact to my reputation as a result of the plaintiffs ongoing false accusations, currently my debts far exceed my assets, I have no income, and I am unable to afford

1 legal council and forced to proceed pro-se. The plaintiff is well aware of my economic status, the
2 plaintiff is currently suing the primary defendant Persistence and Tushar Aggarwal in the Singapore
3 court system with the same claims. It is my understanding that due to the plaintiffs non-US
4 citizenship and Persistence being a Singapore based company Taylor has named me as a defendant
5 with the sole purpose of gaining jurisdiction in the USA, which could potentially be more favorable.
6 To the extent that Persistence has made a motion in this court to have its dispute with the plaintiff
7 resolved in Singapore, I join in that motion.

8
9 In March of 2020 the pandemic caused me a tremendous amount of anxiety and led me to discover
10 a psychic who had predicted the pandemic and I subsequently subscribed to this psychic
11 (Whitedove)s Patreon Newsletter. Her monthly predictions were a source of comfort and
12 entertainment for me, and she had a section for crypto predictions that I paid no attention to. A
13 year into my subscription I noticed that her crypto predictions had gone up almost unbelievably.
14 Feeling that I had missed out on this major opportunity, I was very relieved when she mentioned a
15 new coin that she predicted would do better than anything else she had seen. That coin was
16 Persistence.

17
18 Because I lacked the funds to make a meaningful investment, I had hoped to align with the
19 Persistence team in some way as a marketing consultant. When I mentioned Whitedoves prediction
20 to the plaintiff, the plaintiff immediately said that she also wanted to get involved. At no time did
21 Persistence or their team ask for any funds from myself or the plaintiff. They were instead interested
22 in my potentially helping them with marketing. At no time did Persistence ever offer me a finders
23 fee, I asked them for one. At no time did I ever ask the Plaintiff to invest in Persistence.

24
25 The plaintiff said she wanted to invest before any invitation or request, the plaintiff asked Robert
26 (her physic) his opinion on a number of alt coins and, when he gave Persistence the highest rating,
27 the plaintiff went against my well documented urging to only invest a small amount. Then, on her
28 own, the plaintiff decided, solely in reliance on psychics and without any due diligence in relation to
the project itself, to continue to increase her stake as their price increased.

1 Because I was helping the plaintiff on a full time basis and did not want the complexity of being her
2 employee or her paying me to get in the way of our friendship, I asked the plaintiff if it would be ok
3 for me to take a finders fee in the form of staked tokens after the plaintiff made the decision to
4 purchase Persistence and before the sale was final. I did not want it to compromise our connection
5 and made it very clear this was an option and that I would only do it if the plaintiff gave it her
6 blessing. The plaintiff agreed that it was a good idea and commented that it would cause our
7 interests to be aligned, so I asked Persistence for a finders fee in the form of vested crypto tokens. I
8 told the plaintiff that I would stake my share of tokens along with hers for the year and only realize
9 the gains if the plaintiff netted a profit. All things considered this felt entirely fair and at the time
10 the plaintiff seemed genuinely excited about it.

11 At the time we had that conversation, her investment was set to be small and the value of XPRT
12 relatively low, and as it grew we discussed my setting aside the lions share of my portion for
13 charitable purposes in the future. The finders fee that was set aside for me in the form of tokens lost
14 almost all of its value in the global crypto crash and I neither maintained the tokens nor ever
15 realized ANY financial benefit at any time for any of the help I gave her.

16
17 The plaintiff asked me to help her with Persistence and a number of other low cap purchases
18 because there was no third party available at the time that we could find that could provide such a
19 service. All purchase decisions were solely the Plaintiffs. The plaintiff also made it clear at the time
20 that she wanted me to place these transactions because the plaintiff did not want her family, her
21 family office, or her financial team to be aware of the purchases due to the Plaintiffs questionable
22 investment history that led to a subsequent lock on the plaintiffs assets by her family office. This
23 was especially true at the time of the alt coin purchases as she was making plans to move to England
24 for tax purposes.

25
26 A section of the plaintiffs lawsuit refers to an exchange between us in which I state that I was not
27 taking a commission. This conversation was in reference to the custody of staked assets (not
28 purchases) and is taken completely out of context.

1
2
3 As stated previously: I never realized any compensation in any form from any of the help I provided
4 the plaintiff, which was extremely extensive and unreasonably stress inducing. In the process of
5 helping the plaintiff I lost other lucrative work opportunities, my reputation, as well as the entirety
6 of my net worth.

7
8 RESPONSE TO ALLEGATIONS BY PARAGRAPH

- 9 1. Deny.
10 2. Deny.
11 3. Deny.
12 4. Deny.
13 5. Deny.
14 6. Deny.
15 7. Deny.
16 8. Deny.
17 9. Lack sufficient knowledge.
18 10. Lack sufficient knowledge.
19 11. Lack sufficient knowledge.
20 12. Deny.
21 13. Admit.
22 14. Admit.
23 15. Lack sufficient knowledge.
24 16. Admit.
25 17. Deny.
26
27
28

1 18. Deny.

2 19. Deny.

3 20. Deny.

4 21. Deny.

5 22. Lack sufficient knowledge.

6 23. Deny.

7 24. Deny.

8 25. Deny.

9 26. Deny.

10 27 - 72. Lack sufficient knowledge.

11 73. Deny

12 74. Deny

13 75. Deny

14 76 - 94. Lack sufficient knowledge.

15 95. Deny.

16 96. Deny.

17 97. Deny

18 98. Deny

19 99. Admit

20 100. Admit

21 101. Deny

22 102. Admit

23 103. Deny

24 104. Deny - taken out of context.

25 105. Lack sufficient knowledge.

26 106. Lack sufficient knowledge.

27 107. Admit

28 108. Deny

109. Deny

1 110. Deny.

2 111. Deny

3 112. Deny, this communication was not related to the Persistence transactions and is taken out of
4 context.

5 113. Deny

6 114. Deny

7 115. Deny

8 116. Admit

9 117. Deny

10 118. Deny

11 119. Deny

12 120. Admit

13 121. Admit

14 122. Admit

15 123. Admit

16 124. Deny, taken out of context.

17 125. Deny.

18 126 - 135. Lack sufficient knowledge.

19 136. Deny

20 137. Admit

21 138. Deny

22 138a. Deny, referenced communication did not refer to the Persistence transactions.

23 138b. Lack sufficient knowledge.

24 138c. Lack sufficient knowledge.

25 138d. Lack sufficient knowledge.

26 138e. Admit, to the best of my knowledge this is information received by the Persistence team.

27 138f. Admit, to the best of my knowledge this is information received by the Persistence team.

28 138h. Deny.

1 138i. Deny, taken out of context.

2 138j. Admit, to the best of my knowledge this is information received by the Persistence team.

3 138k. Admit, to the best of my knowledge this is information received by the Persistence team.

4 138l. Admit, to the best of my knowledge this is information received by the Persistence team.

5 138m. Admit, to the best of my knowledge this is information received by the Persistence team.

6 138n. Admit, to the best of my knowledge this is information received by the Persistence team.

7 138o. Lack sufficient knowledge.

8 138p. Admit, to the best of my knowledge this is information received by the Persistence team.

9 138r. Lack sufficient knowledge.

10 139. Lack sufficient knowledge.

11 140. Deny.

12 141. Deny.

13 142. Deny.

14 143. Deny.

15 144. Deny.

16 145. Deny.

17 147. Deny.

18 148. Deny

19 149. Admit.

20 150. Lack sufficient knowledge.

21 152. Lack sufficient knowledge.

22 153. Lack sufficient knowledge.

23 154. Deny.

24 156. Deny.

25 157. Deny.

26 158. Deny.

27 159. Lack sufficient knowledge.

28 160. Deny.

161. Lack sufficient knowledge.

1 162. Deny.

2 163. Deny.

3 164. Deny

4 165. Admit.

5 166. Lack sufficient knowledge.

6 167. Lack sufficient knowledge.

7 168. Lack sufficient knowledge.

8 169. Lack sufficient knowledge.

9 170. Admit.

10 171. Deny.

11 172. Deny.

12 173. Deny.

13 174. Deny.

14 175. Deny.

15 176. Deny.

16 177. Deny.

17 178. Deny.

18 179. Lack sufficient knowledge.

19 180. Lack sufficient knowledge.

20 181. Deny.

21 182. Deny.

22 183. Deny.

23 184. Deny.

24 185. Deny.

25 186. Admit.

26 187. Deny.

27 188. Admit.

28 189. Admit.

190. Admit.

1 191. Lack sufficient knowledge.

2 192. Deny.

3 193. Admit.

4 194. Admit.

5 195. Admit, this was based on my understanding at the time.

6 196. Admit, this was based on my understanding at the time.

7 197. Admit.

8 198. Admit.

9 199. Admit.

10 200. Admit, this was based on my understanding at the time.

11 201. Deny.

12 202. Admit, this was based on my understanding at the time.

13 203. Admit, this was based on my understanding at the time.

14 204. Admit, this was based on my understanding at the time.

15 205. Deny.

16 206. Admit.

17 207. Admit.

18 208. Admit, this was based on my understanding at the time.

19 209. Admit, this was based on my understanding at the time.

20 210. Admit, this was based on my understanding at the time.

21 211. Deny.

22 212. Admit, this was based on my understanding at the time.

23 213. Lack sufficient knowledge.

24 214. Admit, this was based on my understanding at the time.

25 215. Admit.

26 216. Lack sufficient knowledge.

27 217. Deny.

28 218. Deny.

219. Deny.

1 220. Deny.

2 221. Deny.

3 222. Deny.

4 223. Deny.

5 224. Deny.

6 225. Deny.

7 226. Lack sufficient knowledge.

8 227. Admit.

9 228. Admit.

10 229. Lack sufficient knowledge.

11 230. Deny.

12 231. Deny.

13 232. Deny.

14 233. Deny.

15 234. Admit.

16 235. Lack sufficient knowledge.

17 236. Deny.

18 238. Lack sufficient knowledge.

19 239. Lack sufficient knowledge.

20 240. Lack sufficient knowledge.

21 241. Deny.

22 242. Deny.

23 243. Deny.

24 244. Deny.

25 245. Deny.

26 246. Deny.

27 247. Deny.

28 248. Deny.

249. Deny.

1 250. Deny.

2 251. Deny.

3 252. Deny.

4 253. Deny.

5 254. Deny.

6 255. Deny.

7 256. Deny.

8 257. Deny.

9 258. Deny.

10 259. Deny.

11 261. Admit.

12 262. Lack sufficient knowledge.

13 263. Admit.

14 264. Lack sufficient knowledge.

15 265. Deny.

16 266. Deny.

17 267. Deny.

18 268. Lack sufficient knowledge.

19 269. Deny.

20 270. Deny

21 272. Deny.

22 273. Lack sufficient knowledge.

23 274. Lack sufficient knowledge.

24 275. Lack sufficient knowledge.

25 276. Lack sufficient knowledge.

26 277. Deny.

27 278. Lack sufficient knowledge.

28 279. Deny.

1 280. Deny.

2 281. Deny.

3 283. Deny.

4 284. Deny.

5 285. Deny.

6 286. Deny.

7 287. Deny.

8 288. N/A

9 289. Deny.

10 290. Deny.

11 291. Deny.

12 292. Deny.

13 293. Deny.

14 294. Deny.

15 295. NA

16 296. Deny.

17 297. Deny.

18 298. Deny.

19 299. Deny.

20 300. Deny.

21 301. Lack sufficient knowledge.

22 302. NAA

23 303. Deny.

24 304. Deny.

25 305. Lack sufficient knowledge.

26 306. NA

27 307. Lack sufficient knowledge.

28 308. Deny.

309. Deny.

1 310. Deny.

2 311. Deny.

3 312. Deny.

4 313. NA

5 314. Deny.

6 315. Deny.

7 316. Deny.

8 317. Deny, irrelevant.

9 318. Deny.

10 319. Deny.

11 320. Deny.

12
13 ASSERTING CLAIMS AGAINST THE PLAINTIFF (Counterclaim)

14
15 The defendant has the following claim against the plaintiff.

16
17 In the counterclaim, we assert that the plaintiffs dissemination of false claims of theft and fraud has
18 significantly damaged the defendants reputation, leading to substantial financial loss and hinderance
19 of the defendants ability to secure employment. These baseless accusations have caused irreparable
20 harm to the defendants professional standing and financial stability.

21
22 In the counterclaim, we assert that the plaintiffs false fraud claims have inflicted severe emotional
23 and physical distress, which has caused great harm. The defendant looks to receive damages for
24 emotional and physical distress as well as financial damages due to unpaid work for the plaintiff.

25
26 The defendant seeks damages and requires compensation for past legal fees in relation to the
27 plaintiffs continued false accusations, compensation for hundreds of hours of unpaid labor, as well
28 as compensation for medical bills, with an amount to be determined by the court.

CERTIFICATION AND CLOSING

Under the Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge information and belief that this answer: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay or needlessly increase the cost of litigation; (2) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the answer otherwise complies with requirements of Rule 11 to the best of my knowledge.

Date of signing: 12.21.2024

Signature of Defendant:

A handwritten signature in black ink, appearing to read 'AR', followed by a horizontal line extending to the right.

Printed Name of Defendant: Ashley Richardson